

1 THE HONORABLE JOHN H. CHUN  
2  
3  
4  
5  
6  
7  
8

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 NORTHWEST ADMINISTRATORS, INC.,

10 Plaintiff,

11 v.

12 DHL EXPRESS (USA), INC., an Ohio  
13 corporation,

14 Defendant.

15 Case No. 2:23-cv-01430-JHC

16  
17 **SECOND STIPULATION AND  
ORDER EXTENDING  
DEFENDANT'S DEADLINE TO  
ANSWER OR RESPOND TO  
COMPLAINT**

18  
19 NOTE ON MOTION CALENDAR:  
October 31, 2023

20  
21 **STIPULATION**

22  
23 Defendant DHL Express (USA), Inc. and Plaintiff Northwest Administrators, Inc. hereby  
24 STIPULATE AND AGREE to a second extension for Defendant to answer or otherwise respond  
25 to the Complaint to November 15, 2023.

26 On September 20, 2023, Plaintiff served the Complaint on Defendant. On October 10,  
the parties agreed to, and the Court granted, an extension for Defendant's Answer or other  
responsive pleading to November 1, 2023. Dkts. 6, 7. While the parties have since made a good  
faith effort to confer, investigate, and resolve the benefits contribution issues in this lawsuit, more  
time is needed to fully assess the claims in this lawsuit. Accordingly, the parties stipulate and  
agree, subject to the approval of the Court, that good cause exists to further extend Defendant's

SECOND STIPULATION AND ORDER  
EXTENDING DEFENDANT'S DEADLINE  
TO ANSWER OR RESPOND TO  
COMPLAINT - 1

(Case No. 2:23-cv-01430-JHC)

MORGAN, LEWIS & BOCKIUS LLP  
ATTORNEYS AT LAW  
1301 SECOND AVENUE, SUITE 2800  
SEATTLE, WASHINGTON 98101  
TEL +1.206.274.6400 FAX +1.206.274.6401

1 Answer or other responsive pleading to November 15, 2023.

2 This stipulation and order shall not operate as an admission of any factual allegation or  
3 legal conclusion, nor shall it operate as a waiver, nor affect any right, defense, claim or objection,  
4 including lack of jurisdiction and the right to seek arbitration of Plaintiff's claims.

5 *IT IS SO STIPULATED.*

6

7 Dated this 31 day of October, 2023.

8

9

**MORGAN, LEWIS & BOCKIUS LLP**

10

11

12

13

By: s/ Amy P. Taylor

Amy P. Taylor, WSBA #53644

1301 Second Avenue, Suite 2800

Seattle, WA 98101

Phone: (206) 274-6400

Email: amy.taylor@morganlewis.com

14

15

16

17

Melissa D. Hill (*pro hac vice*)

101 Park Avenue

New York, NY 10178-0060

Phone: (212) 309-6318

Email: melissa.hill@morganlewis.com

18

*Attorneys for Defendant*

19

20

21

22

23

24

25

26

SECOND STIPULATION AND ORDER  
EXTENDING DEFENDANT'S DEADLINE  
TO ANSWER OR RESPOND TO  
COMPLAINT - 2

(Case No. 2:23-cv-01430-JHC)

**MORGAN, LEWIS & BOCKIUS LLP**

ATTORNEYS AT LAW

1301 SECOND AVENUE, SUITE 2800

SEATTLE, WASHINGTON 98101

TEL +1.206.274.6400 FAX +1.206.274.6401

1                   **ORDER**

2 IT IS SO ORDERED.

3                   DATED: November 1, 2023.

4  
5                   

6                   THE HONORABLE JOHN H. CHUN  
7                   UNITED STATES DISTRICT JUDGE

8                   *Presented by:*

9                   **MORGAN, LEWIS & BOCKIUS LLP**

10                  By: s/Amy P. Taylor

11                  Amy P. Taylor, WSBA # 53644  
12                  1301 Second Avenue, Suite 2800  
13                  Seattle, WA 98101  
14                  Phone: (206) 274-6400  
15                  Email: amy.taylor@morganlewis.com

16                  Melissa D. Hill (*pro hac vice*)

17                  101 Park Avenue  
18                  New York, NY 10178-0060  
19                  Phone: (212) 309-6318  
20                  Email: melissa.hill@morganlewis.com

21                  *Attorneys for Defendant*

22                  **REID, MCCARTHY, BALLEW & LEAHY,  
23                  LLP**

24                  By: s/Russell J. Reid

25                  Russell J. Reid, WSBA # 2560  
26                  100 West Harrison Street, N. Tower, #300  
27                  Seattle, WA 98119  
28                  Phone: (206) 285-0464  
29                  Email: rjr@rmblaw.com

30                  *Attorney for Plaintiff*

31                  SECOND STIPULATION AND ORDER EXTENDING  
32                  DEFENDANT'S  
33                  DEADLINE TO ANSWER OR RESPOND TO  
34                  COMPLAINT - 3

35                  (Case No. 2:23-cv-01430-JHC)

36                  **MORGAN, LEWIS & BOCKIUS LLP**

37                  ATTORNEYS AT LAW  
38                  1301 SECOND AVENUE, SUITE 2800  
39                  SEATTLE, WASHINGTON 98101  
40                  TEL +1.206.274.6400 FAX +1.206.274.6401